



Alliant Energy Corporation

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March 26, 2015

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: CG Docket No. 02-278

Honorable Secretary Dortch:

On behalf of Alliant Energy Corporation ("Alliant Energy"), the parent company of two Midwest-based energy utilities serving more than 1.4 million electric and natural gas customers in Iowa, Wisconsin and Minnesota, I am writing in support of the Petition for Expedited Declaratory Ruling filed by Edison Electric Institute ("EEI") and American Gas Association ("AGA"), Docket No. 02-278 (the "Petition").

To provide safe, reliable and efficient service, Alliant Energy routinely needs, and is often required to provide, important information to our customers about their service. This includes information pertaining to planned or unplanned outages, repair work, service restoration, curtailment (e.g., due to delinquent bills), or other service interruptions. As EEI and AGA state in the Petition, like other utilities, we risk litigation under the Telephone Consumer Protection Act ("TCPA") for providing this vital information that in many cases is expected by our customers, and is often required to meet our states' regulatory requirements.

We ask that the Federal Communications Commission ("FCC") confirm that providing a telephone number to an energy utility constitutes "prior express consent" to receive non-telemarketing, informational calls related to the customer's utility service at that number. We further request that the Petition be given expedited treatment so that we can continue to communicate with our customers to ensure that they receive the safe, reliable and efficient service they have come to depend upon.

In the regular course of business, our company engages in common and effective means of communication to inform customers of critical, service-related issues. These communications include phone calls when we need to provide timely information that helps customers make decisions related to their service from us. Specifically, we provide information regarding planned outages, tree trimming, service line extensions, periodic meter change-outs and non-pay service interruption notifications. Although we currently do not provide text notifications, we plan to deploy technology later this year that will allow us to communicate via text messaging, depending on customer preference.

We ask customers to provide the best contact number to reach them, and we then verify it each time they contact us, in order to safeguard their private data. Although customers are not required to provide a contact number for their account, we explain that doing so allows us to contact them with important information regarding outages or service-related events. Customers have the option to not provide a contact number, in which case they will not receive any type of informational calls from us. It is our experience that customers readily provide a phone number and expect us to keep them informed as needed. Currently, we do not distinguish between landlines and wireless calls because our systems only store one phone number for each customer.

Below is an example of a telephone message script for planned outage calls, which are made in order to get time-sensitive information to our customers so that they can prepare for the event.

“This is a recorded message from Alliant Energy regarding the (electric/gas) service in the town of (town name).

We have a (type) project and will need to interrupt your (electricity/gas) so that the upgrades can be completed. The project is scheduled to occur on (date), beginning at approximately (time) lasting up to (duration). The alternate date for this project has been scheduled for (date). Again, this is Alliant Energy, and we apologize for any inconvenience this may cause. Thank you.”

Many customer notifications are mandated or urged by state regulators. Again, these communications are made for the benefit of our customers so that they can take the necessary action to prepare for the event or to ensure continued safe and reliable energy service. The following are examples of state regulations related to customer notification:

- Wisconsin Administrative Code
 - Electric PSC 113.0502 – Planned service interruptions: Utilities should strive to give reasonable advance notice to affected customers of each planned service interruption expected to last more than 30 minutes.
 - Electric PSC 113.0301 (11) (a) – The utility shall make a reasonable effort to have a personal or telephone contact with the residential customers prior to disconnection.
- Iowa Administrative Code
 - Electric 20.7(11) – Planned interruptions shall be made at a time that will not cause unreasonable inconvenience to customers, and interruptions planned for longer than one hour shall be preceded by adequate notice to those who will be affected.

- Natural Gas 19.7(7) (b) – Planned interruptions shall be made at a time that will not cause unreasonable inconvenience to customers. Interruptions shall be preceded by adequate notice to those who will be affected.

In addition, both the Public Service Commission of Wisconsin and the Iowa Utilities Board require that utilities make a reasonable effort to reach a customer prior to shutting off service in the case of delinquency.

Our customers rely on us to provide these critical telephonic notifications. In fact, according to J.D. Power and Associates, satisfaction among residential electric-utility customers typically increases when a utility provides customers with timely, accurate information during a service interruption. Restricting or limiting our ability to provide this to customers will be detrimental to our customers' overall experience. Our internal research further suggests that we typically receive more complaints when we did not proactively notify a customer of a possible service interruption. More often than not, our customers compliment us on the advance notice these types of phone calls provide.

In summary, our company supports the Petition seeking confirmation from the FCC that providing a telephone number to an energy utility constitutes "prior express consent" to receive non-telemarketing, informational calls related to the customer's utility service at that number. Although many of the communications that we make to our customers are considered emergency communications and are therefore exempt from TCPA requirements, we can't be sure every call is. However, what we can say with certainty is that all communications made to the number that the customer provided when establishing or continuing service are non-telemarketing, and informational in nature. It is essential to our business and critical to our customers that we continue to offer this form of notification.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregg E. Lawry", with a stylized flourish at the end.

Gregg E. Lawry
Vice President – Customer Service